

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

COMPETITIVE PRODUCT PRICES  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL, FIRST-CLASS PACKAGE INTERNATIONAL SERVICE &  
COMMERCIAL EPACKET CONTRACT 2 (MC2020-157)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-173

COMPETITIVE PRODUCT PRICES  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL, FIRST-CLASS PACKAGE INTERNATIONAL SERVICE &  
COMMERCIAL EPACKET CONTRACT 3 (MC2020-158)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-174

COMPETITIVE PRODUCT PRICES  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL, FIRST-CLASS PACKAGE INTERNATIONAL SERVICE &  
COMMERCIAL EPACKET CONTRACT 4 (MC2020-165)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-188

COMPETITIVE PRODUCT PRICES  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL, FIRST-CLASS PACKAGE INTERNATIONAL SERVICE &  
COMMERCIAL EPACKET CONTRACT 5 (MC2020-170)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-193

COMPETITIVE PRODUCT PRICES  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL, FIRST-CLASS PACKAGE INTERNATIONAL SERVICE &  
COMMERCIAL EPACKET CONTRACT 6 (MC2020-173)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-197

COMPETITIVE PRODUCT PRICES  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL, FIRST-CLASS PACKAGE INTERNATIONAL SERVICE &  
COMMERCIAL ePACKET CONTRACT 7 (MC2020-203)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-230

COMPETITIVE PRODUCT PRICES  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL, FIRST-CLASS PACKAGE INTERNATIONAL SERVICE &  
COMMERCIAL ePACKET CONTRACT 8 (MC2020-218)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-246

COMPETITIVE PRODUCT PRICES  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL, FIRST-CLASS PACKAGE INTERNATIONAL SERVICE &  
COMMERCIAL ePACKET CONTRACT 9 (MC2020-233)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-263

COMPETITIVE PRODUCT PRICES  
GLOBAL RESELLER EXPEDITED PACKAGE CONTRACTS 2  
(MC2013-51 AND CP2013-64)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-227

COMPETITIVE PRODUCT PRICES  
GLOBAL RESELLER EXPEDITED PACKAGE CONTRACTS 2  
(MC2013-51 AND CP2013-64)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-228

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
CONTRACT 1 (MC2020-159)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-177

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
CONTRACT 2 (MC2020-161)  
NEGOTIATED SERVICE AGREEMENTS

Docket No.  
CP2020-184

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
CONTRACT 4 (MC2020-163)  
NEGOTIATED SERVICE AGREEMENTS

Docket No.  
CP2020-186

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
CONTRACT 5 (MC2020-166)  
NEGOTIATED SERVICE AGREEMENTS

Docket No.  
CP2020-189

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
CONTRACT 6 (MC2020-167)  
NEGOTIATED SERVICE AGREEMENTS

Docket No.  
CP2020-190

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
CONTRACT 8 (MC2020-171)  
NEGOTIATED SERVICE AGREEMENTS

Docket No.  
CP2020-194

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
CONTRACT 9 (MC2020-178)  
NEGOTIATED SERVICE AGREEMENTS

Docket No.  
CP2020-202

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
CONTRACT 10 (MC2021-55)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2021-57

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
WITH RESELLER CONTRACT 1 (MC2020-160)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-183

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
WITH RESELLER CONTRACT 2 (MC2020-169)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-192

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
WITH RESELLER CONTRACT 3 (MC2020-176)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-200

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
WITH RESELLER CONTRACT 4 (MC2020-177)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-201

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, COMMERCIAL ePACKET,  
PRIORITY MAIL EXPRESS INTERNATIONAL, PRIORITY MAIL  
INTERNATIONAL & FIRST-CLASS PACKAGE INTERNATIONAL SERVICE  
WITH RESELLER CONTRACT 5 (MC2020-174)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-198

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, INTERNATIONAL SURFACE AIR  
LIFT, COMMERCIAL ePACKET, PRIORITY MAIL EXPRESS  
INTERNATIONAL, PRIORITY MAIL INTERNATIONAL &  
FIRST-CLASS PACKAGE INTERNATIONAL SERVICE CONTRACT 1  
(MC2021-47)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2021-49

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, INTERNATIONAL SURFACE AIR  
LIFT, COMMERCIAL ePACKET, PRIORITY MAIL EXPRESS  
INTERNATIONAL, PRIORITY MAIL INTERNATIONAL &  
FIRST-CLASS PACKAGE INTERNATIONAL SERVICE CONTRACT 2  
(MC2021-54)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2021-56

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, INTERNATIONAL SURFACE AIR  
LIFT, COMMERCIAL ePACKET, PRIORITY MAIL EXPRESS  
INTERNATIONAL, PRIORITY MAIL INTERNATIONAL &  
FIRST-CLASS PACKAGE INTERNATIONAL SERVICE WITH RESELLER  
CONTRACT 1 (MC2020-172)  
NEGOTIATED SERVICE AGREEMENT

Docket No.  
CP2020-195

---

COMPETITIVE PRODUCT PRICES  
INTERNATIONAL PRIORITY AIRMAIL, INTERNATIONAL SURFACE AIR  
LIFT, COMMERCIAL ePACKET, PRIORITY MAIL EXPRESS  
INTERNATIONAL, PRIORITY MAIL INTERNATIONAL &  
FIRST-CLASS PACKAGE INTERNATIONAL SERVICE WITH RESELLER  
CONTRACT 2 (MC2020-175)  
NEGOTIATED SERVICE AGREEMENT

---

Docket No.  
CP2020-199

**UNITED STATES POSTAL SERVICE MOTION TO EXTEND DEADLINE FOR  
QUARTERLY REPORTING**  
(March 18, 2021)

The United States Postal Service (Postal Service) hereby moves to extend the deadline for filing quarterly data reports in the above dockets, from thirty days to sixty days after the close of each quarter. The Postal Service also respectfully requests that instead of filing a Quarter 4 quarterly report in the above dockets, that the Commission review the information concerning the international negotiated service agreements (NSAs) that are the subject of the above dockets that is filed at the end of December in the Postal Service's Annual Compliance Report.

As background, in Commission Order Nos. 5820,<sup>1</sup> 5822,<sup>2</sup> 5823,<sup>3</sup> 5824,<sup>4</sup> 5825,<sup>5</sup>

---

<sup>1</sup> PRC Order No. 5820, Order Approving Modifications to Priority Mail Express International, Priority Mail International, First-Class Package International Service & Commercial ePacket Negotiated Service Agreements, Docket Nos. CP2020-173, CP2020-174, CP2020-188, CP2020-193, CP2020-197, CP2020-230, CP2020-246, and CP2020-263, January 19, 2021, at 5, 9-10.

<sup>2</sup> PRC Order No. 5822, Order Approving Modification One to International Priority Airmail, International Surface Air Lift, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service with Reseller Negotiated Service Agreements, Docket Nos. CP2020-195 and CP2020-199, January 21, 2021, at 4 and 7.

<sup>3</sup> PRC Order No. 5823, Order Approving Modification One and Two to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Negotiated Service Agreements, Docket Nos. CP2020-177, CP2020-184, CP2020-186, CP2020-189, CP2020-190, CP2020-194, and CP2020-202, January 21, 2021, at 5 and 9.

<sup>4</sup> PRC Order No. 5824, Order Approving Modification One to International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service with Reseller Negotiated Service Agreements, Docket Nos. CP2020-183, CP2020-192, CP2020-198, CP2020-200, and CP2020-201, January 21, 2021, at 4-5 and 8.

<sup>5</sup> PRC Order No. 5825, Order Approving Modification One to Global Reseller Expedited Package Services 2 Negotiated Service Agreements, Docket Nos. CP2020-227 and CP2020-228, January 22, 2021, at 4 and 6.

5826,<sup>6</sup> 5827,<sup>7</sup> and 5828,<sup>8</sup> the Postal Service was directed to report on contract-specific volumes, costs, and revenues on a quarterly basis within thirty (30) days of the close of each quarter of the fiscal year, with the first report due April 30, 2021. For the reasons discussed below, the Postal Service respectfully requests that the deadline be extended to sixty days after the close of Quarters 1, 2, and 3, and that instead of filing a Quarter 4 quarterly report in the above dockets, that the Commission review the information concerning the international NSAs that are the subject of the above dockets that is filed at the end of December in the Postal Service's Annual Compliance Report.

There are a number of factors which cause significant challenges to the Postal Service in producing accurate and reliable quarterly data reports for international NSAs within thirty days after the close of each quarter. These challenges are similar to those that the Postal Service identified in the motion filed in Docket No. CP2017-219, in which the Postal Service requested an extension from thirty days to sixty days for the filing of a quarterly report concerning a domestic NSA.<sup>9</sup> The Commission granted that request on November 15, 2019, noting that "[t]he Commission agrees with the Postal Service that more-accurate data is preferable."<sup>10</sup> Some of the same factors that prompted the Postal Service's motion in Docket No. CP2017-219 apply in

---

<sup>6</sup> PRC Order No. 5826, Order Adding International Priority Airmail, International Surface Air Lift, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 1 to the Competitive Product List, Docket No. CP2021-49, January 22, 2021, at 6-8.

<sup>7</sup> PRC Order No. 5827, Order Adding International Priority Airmail, International Surface Air Lift, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 2 to the Competitive Product List, Docket No. CP2021-56, January 22, 2021, at 6-8.

<sup>8</sup> PRC Order No. 5828, Order Adding International Priority Airmail, Commercial ePacket, Priority Mail Express International, Priority Mail International & First-Class Package International Service Contract 10 to the Competitive Product List, Docket No. CP2021-57, January 22, 2021, at 6-8.

<sup>9</sup> USPS Motion to Extend Deadline for Quarterly Reporting, Docket No. CP2017-219, October 15, 2019.

<sup>10</sup> PRC Order No. 5307, Order on Motions, Docket No. CP2017-219, November 15, 2019, at 2.

the instant dockets.

Quarterly international NSA data is processed as part of the Postal Service's quarterly filings of Revenue, Pieces and Weight (RPW). In particular, the RPW data typically are finalized within forty (40) days after the end of each of the first three quarters, and within sixty (60) days after the end of the fourth quarter, in accordance with 39 C.F.R. § 3050.25(c).<sup>11</sup> Postal Service personnel must first reconcile and quality control the RPW and Billing Determinant data, and then additional time is required to prepare the requested quarterly report, which will include additional information regarding costs, contribution and cost coverage by product for each of the international NSAs that are the subject of the dockets listed above.

Furthermore, the compilation of international NSA data is complicated. In most instances, were the Postal Service to produce quarterly data reports concerning the international NSAs that are the subject of the instant dockets within thirty days of the close of each quarter, as requested by the Commission, the Postal Service would necessarily rely on preliminary data that may change significantly as a result of differences between the preliminary data available within 30 days of the close of each quarter and what may be available after the RPW is finalized. The main focus of the Postal Service's Finance Department after each quarter ends is to ensure that RPW and Billing Determinants are accurate and can be delivered to the Commission within their expected time frames. Adding special quarterly international NSA data reports that must be produced within thirty days of the close of each quarter creates a significant

---

<sup>11</sup> See 39 C.F.R. § 3050.25(c), which states that the Postal Service shall provide "(c) Revenue, pieces, and weight by rate category and special service by quarter, within 40 days of the close of Quarters 1, 2, and 3 of the fiscal year and 60 days after Quarter 4, but no later than the filing of reports filed pursuant to section 3050.40(a) or 3050.40(b)."



resource burden on those same personnel, and ultimately may not produce fully accurate data that would be available once final RPW data can be relied upon.

In addition, the Postal Service notes that the preparation of the FY2021 Quarter 2 report for the instant dockets will be particularly complex, partially because of the change in the number of country groups for IPA, ISAL, PMEI, PMI, and FCPIS that went into effect on January 24, 2021.<sup>12</sup>

In conclusion, the Postal Service submits that sixty days after the close of each quarter is a more reasonable deadline for the Postal Service, and respectfully moves to extend the deadline from thirty to sixty days. Also, the Postal Service respectfully requests that instead of filing a Quarter 4 report in the instant dockets, that the Commission review the information concerning the international NSAs that are the subject of the above dockets that is filed at the end of December in the Postal Service's Annual Compliance Report.

Respectfully submitted,

UNITED STATES POSTAL SERVICE  
By its attorneys:

Anthony F. Alverno  
Chief Counsel  
Global Business and Service Development  
Corporate and Postal Business Law Section

Christopher C. Meyerson  
Mariana Moguel Resendiz  
Rebecca E. Brown  
Attorneys

475 L'Enfant Plaza, S.W.  
Washington, D.C. 20260-1101  
(202) 268-7820  
christopher.c.meyerson@usps.gov  
March 18, 2021

---

<sup>12</sup> See PRC Order No. 5760, Order Approving Price Adjustments for Competitive International Products, Docket No. CP2021-15, November 24, 2020.